

Jean M. Farley

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
(Boston)

IN RE:

Yvonne V. Skapars
Debtor

CHAPTER 13
CASE NO. 15-11221-JNF

MOTION TO APPROVE STIPULATION

Now comes Champion Mortgage Company and states that a stipulation was entered into by Champion Mortgage Company and the Debtor, Yvonne V. Skapars on September 14, 2015. Champion Mortgage Company respectfully requests that this Court Approve said stipulation subject to the following language:

IF THE DEBTOR FAILS TO MAKE SAID PAYMENTS BY THE DATES SPECIFIED IN PARAGRAPH TWO OF THIS STIPULATION, RELIEF FROM STAY MAY BE GRANTED WITHOUT HEARING BY THE COURT UPON LENDER FILING A CERTIFICATE OF NON-COMPLIANCE TEN (10) DAYS NOTICE OF DEFAULT TO THE DEBTOR AND TO THE DEBTOR'S ATTORNEY, BY FIRST CLASS MAIL, POSTAGE PREPAID, OR BY FACSIMILE. A \$50.00 FEE SHALL BE CHARGED FOR EACH NOTICE OF DEFAULT, AND A \$150.00 FEE SHALL BE CHARGED FOR EACH CERTIFICATE OF NON-COMPLIANCE NEEDED THROUGHOUT THE LIFE OF THIS STIPULATION AGREEMENT. THE DEBTOR HAS THE RIGHT TO OBJECT TO THE CERTIFICATE OF NON-COMPLIANCE ONLY ON THE BASIS THAT THE PAYMENTS WERE MADE TIMELY UNDER THE STIPULATION.

Respectfully submitted,
Champion Mortgage Company
By its Attorney,

/s/ Tatyana P. Tabachnik
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Dated: September 14, 2015

NOTICE

All Objections to this Motion must be filed within fifteen (15) days of this date unless otherwise ordered by Court.